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By E-Mail PDF

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Re: *Ina Steiner, et. al, v. eBay Inc., et. al*, No. 21-cv-11181-PBS (D. Mass.)

Dear Mr. Fromson:

I write in response to your Notice of Deposition to Defendant Jim Baugh dated June 12, 2024.

As you may know, Mr. Baugh is currently incarcerated at FPC Montgomery in Alabama, with a projected release date of June 29, 2026. Accordingly, he cannot attend the deposition at Nelson Mullins in Boston as noticed, and his deposition can only be conducted upon issuance of a court order pursuant to Fed. R. Civ. P. 30(a)(2)(B).

In addition, please be advised that we expect Mr. Baugh will invoke his rights under the 5th Amendment to the U.S. Constitution in response to substantive questions concerning allegations in the Complaint.

Sincerely,



William W. Fick

cc: all counsel of record and *pro se* parties (by email)